UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

MADELYN RODIER,	)	Case No. 1:11-cv-04769 (RBK)
	)	(AMD)
Plaintiff,	)	
	)	(Document Electronically Filed)
	)	
v.	)	
	)	
CHICO'S FAS, INC., HEIDI	)	
MARGGRAF, LISA SCHAFFER, AND	)	
JOHN DOES 1 THROUGH 15,	)	
inclusive, fictitious named defendants,	)	Return Date: May 20, 2013
jointly, severally, and in the alternative,	)	
	)	
Defendants.	)	ORAL ARGUMENT REQUESTED

**REPLY DECLARATION MICHAEL TILIAKOS IN FURTHER SUPPORT
OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT OR
PARTIAL SUMMARY JUDGMENT**

Dated: New York, New York
  May 13, 2013

    Anthony J. Rao (Admitted Pro Hac Vice)
    Michael Tiliakos

DUANE MORRIS LLP
1540 Broadway
New York, New York 10036
(212) 692-1000

Attorneys for Defendants CHICO'S FAS, INC., HEIDI MARGGRAF,
AND LISA SHAFFER

MICHAEL TILIAKOS, ESQ. an attorney duly admitted to practice law in the State of New Jersey, under penalty of perjury hereby declares:

1.   I am a member of the Bar of this Court and a partner with the law firm Duane Morris LLP, attorneys for Chico's FAS, Inc. ("Chico's"), Heidi Marggraf ("Margraff") and Lisa Shaffer ("Shaffer")[1] (collectively "Defendants"). I submit this Reply Declaration in Further Support of Defendants' Motion for Summary Judgment, pursuant to Rule 56(b) of the Federal Rules of Civil Procedure, and to place before the Court true and correct copies of excerpts of deposition transcripts. I know the facts testified to in this Declaration to be true based on my own personal knowledge and a review of the documents.

2.   True and correct copies of additional relevant portions of the transcript from the deposition of Plaintiff Madelyn Rodier, taken on July 10, 2012, is attached hereto as Exhibit R.

3.   This additional pages (pages 36 and 37) should be considered by the Court pursuant to Rule 106 of the Federal Rules of Evidence.

I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the foregoing is true and correct.

Executed on May 13, 2013

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Michael Tiliakos

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[1] Plaintiff misspelled Lisa Shaffer's name in the Complaint.

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